

**FILED**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AUG 13 2020

UNITED STATES OF AMERICA

v.

DENNIS RENFRO

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

Criminal No. 20-197

[UNDER SEAL]

**INDICTMENT MEMORANDUM**

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Brendan J. McKenna, Assistant United States Attorney for said District, and submits this Indictment Memorandum to the Court:

**I. THE INDICTMENT**

A federal grand jury returned an eleven-count indictment against the above-named defendant for alleged violations of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
One through Eleven	False Statement in Purchase of a Firearm	18 U.S.C. § 922(a)(6)
	On or about January 2, 2019 (Count One)	
	On or about March 2, 2019 (Count Two)	
	On or about July 16, 2019 (Count Three)	
	On or about September 3, 2019 (Count Four)	
	On or about December 26, 2019 (Count Five)	
	On or about February 13, 2020 (Count Six)	
	On or about April 2, 2020 (Count Seven)	
	On or about April 9, 2020 (Count Eight)	
	On or about April 29, 2020 (Count Nine)	
	On or about May 4, 2020 (Count Ten)	
	On or about May 6, 2020 (Count Eleven)	

## **II. ELEMENTS OF THE OFFENSES**

### **As to Counts 1 through 11:**

In order for the crime of false statement in purchase of a firearm, in violation of 18 U.S.C. § 922(a)(6), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the seller named in the Indictment was a licensed dealer;
2. That DENNIS RENFRO made a false statement while acquiring a firearm from the seller named in the Indictment;
3. That DENNIS RENFRO knew that the statement was false; and
4. That the false statement was intended or likely to deceive the seller named in the Indictment with respect to any fact material to the lawfulness of the sale of the firearm.

Third Circuit Model Criminal Jury Instruction 6.18.922A.

## **III. PENALTIES**

**As to Counts 1 through 11: False Statement in Purchase of a Firearm (18 U.S.C. § 922(a)(6)):**

1. A term of imprisonment of not more than ten (10) years.
2. A fine of not more than \$250,000 (18 U.S.C. § 3571(b)(3)).
3. A term of supervised release of three (3) years (or five (5) years if 18 U.S.C. § 924(e) applies) (18 U.S.C. § 3583).

## **IV. MANDATORY SPECIAL ASSESSMENT**

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013.

## **V. RESTITUTION**

Not applicable in this case.

**VI. FORFEITURE**

As set forth in the Indictment, forfeiture may be applicable in this case.

Respectfully submitted,

SCOTT W. BRADY  
United States Attorney

/s/ Brendan J. McKenna  
BRENDAN J. MCKENNA  
Assistant U.S. Attorney  
PA ID No. 314315